

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**STIPULATION AND [PROPOSED]
ORDER TO MODIFY SCHEDULE FOR
POST-DISTRIBUTION ACCOUNTING
FOR THE CLASS ACTION
SETTLEMENTS**

This Document Relates to:

All Class Actions

Plaintiffs and Defendants stipulate and agree, subject to the Court's approval, to modify the schedule in connection with the class settlements' post-distribution accounting.

WHEREAS, on March 6, 2024, the Court directed that the class settlements' post-distribution accounting should be filed by September 25, 2024, and scheduled a hearing for October 2, 2024. Dkt. 4204. In the minute order, the Court noted that "Counsel may stipulate to move these deadlines so that the accounting will be filed at least 21 days after the settlement payments have issued and/or become stale, whichever date is later." *Id.*;

WHEREAS, on September 25, 2024, the Court entered the Parties' stipulation rescheduling the class settlements' post-distribution accounting deadline to April 30, 2024, and hearing for May 6, 2025. Dkt. 4318. The stipulation again noted that the deadlines may be furth adjusted as needed;

1 WHEREAS, Class Counsel and Epiq began the first distribution of payments to claimants
2 on October 18, 2024;

3 WHEREAS, Epiq has received disputes from claimants and has conducted a review of these
4 contested claims. On March 21, 2025, the Court approved distribution of funds to successful
5 disputing claimants, Dkt. 4394, and Epiq began disbursing funds on April 22, 2025;

6 WHEREAS, certain successful disputing claimants have until May 2, 2025 to submit
7 documentation supporting their claims. Once any documentation is received and payment amounts
8 calculated, Epiq will disburse funds to this population no later than May 30, 2025;

9 WHEREAS, all checks issued to disputing claimants will be stale by December 1, 2025;

10 WHEREAS, the parties stipulate that the deadline to file a post-distribution accounting
11 should be moved to December 22, 2025, and a hearing set at the Court's convenience;

12 WHEREAS, if a second distribution is needed, counsel will notify the Court and may
13 request further changes to the schedule for the post-distribution accounting;

14 NOW THEREFORE, the Plaintiffs and the Defendants, through their undersigned counsel,
15 hereby stipulate, agree and respectfully request that the Court order as follows:

16 The class settlements' post-distribution accounting shall be filed by **December 22, 2025**,
17 and a hearing scheduled at the Court's convenience if the Court deems it appropriate. These dates
18 may be further adjusted on stipulation of the parties and subject to approval of the Court.

19
20 **IT IS SO STIPULATED.**

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22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23
24 Dated: _____

Honorable Judge William H. Orrick

1 Dated: April 30, 2025

Respectfully submitted,

2
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By: /s/ Sarah R. London

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CERTIFICATE OF SERVICE

I, Dena C. Sharp, hereby certify that on the April 30, 2025, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notifications to all counsel of record.

By: /s/ Dena C. Sharp